

**IN THE UNITED STATES DISTRICT  
COURT FOR THE EASTERN  
DISTRICT OF MICHIGAN**

DONALD AND BELYNDA  
GAMBRELL,

Case No.: 2:21-cv-11846-DML-CI

Plaintiff,

v.

Hon. David M. Lawson  
Magistrate Judge Curtis Ivy, Jr.

G4S SECURE SOLUTIONS (USA) INC.,  
RENAISSANCE CENTER  
MANAGEMENT COMPANY, AND  
GENERAL MOTORS, LLC,

Jointly and severally,

Defendants.

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**NOTICE OF SETTLEMENT  
&  
EMERGENCY APPLICATION:  
JOINT MOTION TO EXTEND TIME TO FILE MOTIONS *IN LIMINE***

**STATEMENT OF ISSUE PRESENTED**

Whether the Court should grant the Parties' emergency application to extend the Parties' time to file motions *in limine*.

**Plaintiffs Respond:      Yes**

**Defendants Respond:    Yes**

Whether the Court should grant the Parties' emergency application to extend the Plaintiffs' time to file Plaintiffs' Responses to Summary Judgment Motions.

**Plaintiffs Respond:      Yes**

**Defendants Respond:    Yes**

Whether the Court should grant the Parties' emergency application to extend the Parties' time to file Objections to the Magistrate November 28, 2022 Order.

**Plaintiffs Respond:      Yes**

**Defendants Respond:    Yes**

**STATEMENT OF COMPLIANCE WITH L.R. 7.1(a)**

On December 8, 2022, counsel for the Parties conferred regarding the relief requested in this motion, during which counsel for Plaintiffs advised that Plaintiffs do not oppose the relief requested herein. This motion was prepared jointly and is being submitted on behalf of all parties.

**STATEMENT OF RELEVANT AUTHORITY**

1. Fed. R. Civ. P. 16(b)(4): “A schedule may be modified only for good cause and with the judge’s consent.”

## **INTRODUCTION**

Jointly, Plaintiffs, by and through their counsel, and Defendants, by and through their counsel (collectively referred to as “Parties”), hereby: (1) notify the Court that they have reached a settlement; and (2) request an extension of time to file motions *in limine*, currently set for December 14, 2022 [ECF No. 23]; extend time to file Plaintiffs’ Responses to Summary Judgment Motions and the time for the Parties to file Objections to the Magistrate’s November 28, 2022 Order [ECF No. 110], for good cause shown.

On December 8, 2022, the Parties attended mediation, a settlement was reached, and a settlement agreement was executed by the parties (and/or their respective representatives) (the “Agreement”). Given certain language within the Agreement, the Agreement will not be enforceable until December 15, 2022.

The Parties’ deadline to file motions *in limine* is currently set for December 14, 2022; the Parties’ deadline to file objections to the Magistrate’s November 28, 2022 Order is currently December 12, 2022; Plaintiffs’ deadline for filing a response to Defendants’ two Summary Judgment motions is currently December 19, 2022 which are all prior to the time in which the Agreement will become enforceable. If a settlement is revoked, the Parties intend on filing various motions in *limine*, Objections to the Magistrate’s November 28, 2022 Order and Responses to Defendants’ two Summary Judgment motions.

Respectfully, the Parties believe that their clients would benefit from avoiding incurring additional fees and costs associated with briefing and filing numerous motions, responses and objections. An extension of the above deadlines would give the Parties an opportunity to allow the Settlement Agreement to take effect (thereby obviating the need to file any such responses, motions or objections).

### **CONCLUSION**

The Parties respectfully request that the Court extend the deadlines to file motions *in limine*, Objections to Magistrate's November 28, 2022 Order and Plaintiffs' Responses to Defendants' two Summary Judgment Motions in order to ascertain whether this matter is resolved with finality.

Dated: December 9, 2022

/s/Danielle B. Saffran (w/ permission)

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**CERTIFICATE OF SERVICE**

I certify that on this 9<sup>th</sup> day of December 2022, I filed this document using this Court's CM/ECF System that will automatically notify all parties or counsel of record.

/s/ Kelly Eisenlohr-Moul  
Kelly Eisenlohr-Moul